

## **REMARKS**

The Examiner is thanked for performing a thorough search.

Claims 1, 7, 15, 18, 32-33, 34, 37, 44, 46, 51, 54, 61, 63, 68, 71, 78, and 80 have been amended. Claims 14, 43, 60, and 77 have been canceled or added. Hence, Claims 1, 5-7, 9-13, 15-16, 18-22, 32-42, 44-59, 61-76, and 78-84 are currently pending in the present application.

Each issue raised in the Office Action mailed on July 27, 2006 is addressed hereinafter.

### **I. SUMMARY OF TELEPHONE INTERVIEW**

The Examiner is thanked for granting the courtesy of a telephone interview on October 25, 2006. Examiners Gautam Sain and William Bashore and Applicant's representatives Christopher Palermo and Stoycho Draganoff participated in the interview. Claim 1 and proposed amendments thereof were discussed. The references discussed were Harrison et al., U.S. Patent No. 6,611,725 ("HARRISON") and Lewallen, U.S. Patent No. 6,675,230 ("LEWALLEN"). Agreement regarding patentability was not reached.

The Applicant's representatives described an example embodiment in order to illustrate the features included in Claim 1 and to distinguish the claim from HARRISON and LEWALLEN. The Examiner indicated that the proposed amendments would receive a favorable consideration when filed in this official reply.

### **II. ISSUES RELATED TO THE CITED ART**

#### **A. INDEPENDENT CLAIM 1**

Claim 1 was rejected as allegedly unpatentable under 35 U.S.C. §103(a) over HARRISON in view of LEWALLEN. The rejection is respectfully traversed.

Claim 1 recites:

...  
wherein the second document type definition file is a text file that includes one or more declarations conforming to eXtensible Markup Language (XML) syntax, wherein the one or more declarations define the binding element;

...;  
modifying the SVG statements to generate modified SVG statements, wherein the  
modified SVG statements include the information pertaining to the object but do  
not include the instance of the binding element;  
... .

It is respectfully submitted that HARRISON and LEWALLEN, whether taken alone or in combination, do not teach, describe, or suggest the above features of Claim 1.

The Office Action asserts that the DOM described in col. 9, lines 45-55 of LEWALLEN is equivalent to the second document type definition file featured in Claim 1. This assertion is incorrect. The DOM described in LEWALLEN allows a document to be expressed as a hierarchical relationship of objects that may be separately manipulated. (LEWALLEN, col. 9, lines 45-48.) Further, the DOM described in LEWALLEN refers to a DOM API interface that may be implemented by browsers such as Internet Explorer and Mozilla-based browsers. (Please see LEWALLEN, col. 5, lines 33-44.) Thus, the DOM described in LEWALLEN refers to an interface that is implemented in the memory space of a browser. In contrast, the second document type definition file featured in Claim 1 is a text file that includes one or more declarations which conform to XML syntax and define a binding element. For this reason, LEWALLEN does not describe or suggest the second document type definition file featured in Claim 1.

The Office Action also asserts that in col. 4, line 62 to col. 5, line 11, HARRISON describes the feature of Claim 1 of modifying the SVG statements to generate modified SVG statements, where the modified SVG statements include the information extracted based on the pointer but do not include the instance of the binding element. This assertion is incorrect. Nothing in HARRISON and LEWALLEN describes a binding element defined in a DTD file or an instance thereof. Further, HARRISON and LEWALLEN do not teach or describe the following combination of features of Claim 1: retrieving an SVG document that includes SVG

statements associated with a graphical representation of an object and an instance of a binding element that binds the SVG statements to a pointer for referencing a resource that includes information pertaining to the object; extracting the information pertaining to the object from the resource based on the pointer; modifying the SVG statements to generate modified SVG statements that include the extracted information but not the instance of the binding element; and rendering a second graphical representation of the object based on the modified SVG statements.

Specifically, in col. 4, line 62 to col. 5, line 11, HARRISON describes that a 2-D drawing may be generated from a 3-D CAD model, where the 2-D drawing may be in a drawing document format that includes image elements. Further, in col. 5, lines 8-12, HARRISON expressly teaches that a 2-D drawing document is updated in response to a change in the model component documents of the underlying 3-D model. In contrast, Claim 1 recites features according to which SVG statements are modified to generate other SVG statements. For this reason, HARRISON does not teach or describe the feature of Claim 1 of modifying the SVG statements to generate modified SVG statements, where the modified SVG statements include the information extracted based on the pointer but do not include the instance of the binding element.

For the above reasons, HARRISON and LEWALLEN, whether taken alone or in combination, do not teach all features of Claim 1. Thus, Claim 1 is patentable under 35 U.S.C. §103(a) over HARRISON in view of LEWALLEN. Reconsideration and withdrawal of the rejection of Claim 1 is respectfully requested.

**B. DEPENDENT CLAIMS 5-7, 9-13, 15-16, 18-22, AND 32-33**

Claims 5-7, 9-13, 15-16, 18-22, and 32-33 were rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over HARRISON in view of LEWALLEN.

Each of Claims 5-7, 9-13, 15-16, 18-22, and 32-33 depends from independent Claim 1, and thus includes each and every feature of the independent base claim. Therefore, each of Claims 5-7, 9-13, 15-16, 18-22, and 32-33 is allowable for at least the reasons given above for Claim 1. In addition, each of Claims 5-7, 9-13, 15-16, 18-22, and 32-33 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those features is not included at this time. Thus, Claims 5-7, 9-13, 15-16, 18-22, and 32-33 are allowable for at least the reasons given above for Claim 1. Reconsideration and withdrawal of the rejection of Claims 5-7, 9-13, 15-16, 18-22, and 32-33 is respectfully requested.

C. INDEPENDENT CLAIMS 34, 51, AND 68

Claims 34, 51, and 68 were rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over HARRISON in view of LEWALLEN.

Each of Claims 34, 51, and 68 includes features similar to the features of Claim 1 discussed above except in the context of an apparatus and a computer-readable medium. For this reason, Claims 34, 51, and 68 are allowable under 35 U.S.C. § 103(a) over HARRISON in view of LEWALLEN for at least the reasons given above for Claim 1. Reconsideration and withdrawal of the rejection of Claims 34, 51, and 68 is respectfully requested.

D. DEPENDENT CLAIMS 35-42, 44-50, 52-59, 61-67, 69-76, AND 78-84

Claims 35-42, 44-50, 52-59, 61-67, 69-76, and 78-84 were rejected as allegedly unpatentable under 35 U.S.C. § 103(a) over HARRISON in view of LEWALLEN.

Each of Claims 35-42, 44-50, 52-59, 61-67, 69-76, and 78-84 depends from one of independent Claims 34, 51, and 68, and thus includes each and every feature of the corresponding base claim. Therefore, each of Claims 35-42, 44-50, 52-59, 61-67, 69-76, and 78-

84 is allowable for the reasons given above for Claims 34, 51, and 68. In addition, each of Claims 35-42, 44-50, 52-59, 61-67, 69-76, and 78-84 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of those features is not included at this time. Therefore, Claims 35-42, 44-50, 52-59, 61-67, 69-76, and 78-84 are allowable for at least the reasons given above with respect to Claims 34, 51, and 68.

Reconsideration and withdrawal of Claims 35-42, 44-50, 52-59, 61-67, 69-76, and 78-84 is respectfully requested.

### III. CONCLUSION

The Applicant believes that all issues raised in the Office Action have been addressed. Further, for the reasons set forth above, it is respectfully submitted that all pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

To the extent necessary to make this reply timely filed, the Applicant petitions for an extension of time under 37 C.F.R. § 1.136.

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If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 52-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

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